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**U.S. MAGISTRATE
JUDGE**

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

FELONY COMPLAINT

Plaintiff,

Case No. *2:09-MJ-373-DN*

vs.

MICHAEL LEE WIGHT,

VIO. 18 U.S.C. § 875(c), THREATS IN
INTERSTATE COMMERCE

Defendants.

Before David O. Nuffer, United States Magistrate Judge for the District of Utah, appeared the undersigned, who on oath deposes and says:

COUNT I

On or about November 4, 2009, in the Central Division of the District of Utah,

MICHAEL LEE WIGHT,

did knowingly transmit in interstate and foreign commerce via the world wide web, a communication on his MySpace web page directed to an individual (whose name is known to the agent) employed with the Internal Revenue Service, and the communication contained a threat to

injure that person, specifically "I got Your Vengeance and Justice Coming to You all with My Guns Bitches!!!! These Guns and others like them will Insure Your Death and the return of Freedom in America!..." All in violation of Section 875(c) of Title 18 of the United States Code.

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Gregory Todd Knapp, ("your affiant"), a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI), Joint Terrorism Task Force (JTTF), Salt Lake City Division, being duly sworn, depose and state as follows:

1. Your affiant has been employed as a Deputy Sheriff with the Utah County Sheriff's Office for the past twelve years. Since 2006 your affiant has been assigned to the Joint Terrorism Task Force, and is cross-designated to enforce federal laws. Since joining the JTTF, I have investigated violations of federal law in various areas including threats to injure or kill the person of another transmitted in interstate or foreign commerce. I have gained experience through training in seminars, classes, and everyday work related to conducting these types of investigations.

2. As a Task Force Officer, your affiant is authorized to investigate violations of the laws of the United States and is a law enforcement officer with the authority to execute warrants issued under the authority of the United States.

FACTS AND CIRCUMSTANCES

3. The statements in this affidavit are based in part on information provided by Special Agents of the FBI, Task Force Officers, (TFO), of the Joint Terrorism Task Force, and on my experience and background as a Task Force Officer of the FBI. I have set forth the facts that I

believe are necessary to establish probable cause to believe that MICHAEL LEE WIGHT has committed violations of Title 18 United States Code, Section 875(c).

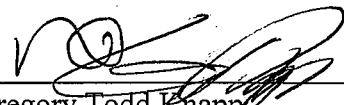
4. Your affiant knows that MICHAEL LEE WIGHT controls a My Space page that clearly bears his photograph holding a firearm. I have researched public record databases, including Utah driver licenses, to confirm WIGHT's identity. My Space pages are available on the internet where messages are transmitted in interstate and foreign commerce. As recently as November, 2009, your affiant saw copies made of that My Space page which contained another photograph on WIGHT's MySpace page showing a number of firearms laying on a bed. I have confirmed that WIGHT lives in Utah County, State of Utah.

5. On or about November 4, 2009, your affiant knows that the following writing appeared underneath the aforementioned photograph of the firearms on the bed: "Dedicated to the Assholes and Government Tyrants who Fuck with me and the other REAL Americans!" WIGHT continued: "I was just thinking about this video today and i have this song on my MP3 App on my Blackberry phone..I dedicate this to the Bitch and her Husband that caused me Lifetime injuries when the Bitch hit me with her Car and THEY HAD NO FUCKING INSURANCE and then LIED about the Accident to try and Blame me! I also dedicate this to the INTERNAL REVENUE SERVICE ACS Collection Manager, *[name deleted for purposes of this affidavit]* in Fresno, Califuck-Ya who steals My money every Month for the last 2 1/2 Years I got Your Vengance and Justice Coming to You all with My Guns Bitches!!!! These Guns and others like them will Insure Your Death and the return of Freedom in America!..." (sic).

6. I have confirmed with the Internal Revenue Service that the person named in WIGHT's posted MySpace threat is a real person employed with the IRS.

CONCLUSION

Based upon the foregoing, your affiant believes there is probable cause to believe that MICHAEL LEE WIGHT, transmitted in interstate or foreign commerce any communication containing any threat to injure the person of another, all in violation of Title 18 United States Code, Section 875(c).



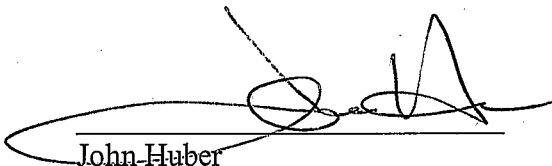
Gregory Todd Knapp
Task Force Officer
Federal Bureau of Investigation

Sworn and subscribed before me this 4 day of April 2009



David O. Nuffer
UNITED STATES MAGISTRATE JUDGE

Approved:



John Huber
Assistant United States Attorney